

Exhibit G



Holly Cole <holly@holcombward.com>

RE: Subpoena to Produce Documents in Floyd's of Leadville, Inc. v. Alexander Capital, LP et al.; Civil Action No. 1:22-cv-03318-DEH

1 message

Daniel Vedra <dan@vedralaw.com>

Thu, Oct 10, 2024 at 1:47 PM

To: Christopher Milazzo <CMilazzo@srfc.law>, Bryan Ward <bryan.ward@holcombward.com>

Cc: Paul Rachmuth < paul@paresq.com>, Holly Cole <holly@holcombward.com>, Aaron Wright <aaron@holcombward.com>

To make sure everyone is aware and on the same page, Floyd's of Leadville objects to this production both on the grounds that it will occur after the discovery cutoff and that it seeks attorney client communications and is privileged.



1444 Blake Street

Denver, CO 80202

Office: (303) 937-6540

Direct: (720) 295-9391

Fax: (303) 937-6547

From: Christopher Milazzo <CMilazzo@SRFC.LAW>
Sent: Thursday, October 10, 2024 9:50 AM
To: 'Bryan Ward' <bryan.ward@holcombward.com>; Daniel J. Vedra <dan@vedralaw.com>
Cc: Paul Rachmuth < paul@paresq.com>; Holly Cole <holly@holcombward.com>; Aaron Wright <aaron@holcombward.com>
Subject: RE: Subpoena to Produce Documents in Floyd's of Leadville, Inc. v. Alexander Capital, LP et al.; Civil Action No. 1:22-cv-03318-DEH

Bryan:

I agree to accept service on behalf of CMF, and waive any objection with respect to the production taking place after the close of discovery.

Christopher P. Milazzo

Partner

Sichenzia Ross Ference Carmel LLP

1185 Avenue of the Americas, 31st floor

New York, NY 10036

T: (212) 930-9700 ext. 668 | D: 646-838-1311 | F (212) 930-9725

cmilazzo@srfc.law | www.srfc.law



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From: Bryan Ward <bryan.ward@holcombward.com>
Sent: Thursday, October 10, 2024 10:52 AM
To: Christopher Milazzo <CMilazzo@SRFC.LAW>; Daniel J. Vedra <dan@vedralaw.com>
Cc: Paul Rachmuth <paul@paresq.com>; Holly Cole <holly@holcombward.com>; Aaron Wright <aaron@holcombward.com>
Subject: RE: Subpoena to Produce Documents in Floyd's of Leadville, Inc. v. Alexander Capital, LP et al.; Civil Action No. 1:22-cv-03318-DEH

Thanks for the call, Chris. As discussed, please confirm that you accept service. Also, if you confirm that you will not object to producing documents after the upcoming October 18, 2024, close of fact discovery in the above-referenced matter – and counsel for the other parties confirm they also have no such objection – then we agree to extend the deadline for production to October 25, 2024.

With respect to privilege, we understand you object to producing to us any potentially privileged communications. We're working with plaintiff's counsel to resolve the privilege issue and expect to have that resolved, one way or another, relatively soon.

Bryan M. Ward | Holcomb + Ward | 404-892-5695

From: Christopher Milazzo <CMilazzo@SRFC.LAW>
Sent: Thursday, October 10, 2024 10:04 AM

To: 'Bryan Ward' <bryan.ward@holcombward.com>; Daniel J. Vedra <dan@vedralaw.com>
Cc: Paul Rachmuth <paul@paresq.com>; Holly Cole <holly@holcombward.com>; Aaron Wright <aaron@holcombward.com>
Subject: RE: Subpoena to Produce Documents in Floyd's of Leadville, Inc. v. Alexander Capital, LP et al.; Civil Action No. 1:22-cv-03318-DEH

Bryan:

Can you give me a call on my cell at 914-874-4719 regarding the subpoena.

Christopher P. Milazzo

Partner

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From: Bryan Ward <bryan.ward@holcombward.com>

Sent: Friday, October 4, 2024 7:56 AM

To: Daniel J. Vedra <dan@vedralaw.com>; Ross Carmel <rcarmel@srfc.law>; cmilazzo@cmflp.com

Cc: Paul Rachmuth <paul@paresq.com>; Holly Cole <holly@holcombward.com>; Aaron Wright <aaron@holcombward.com>

Subject: RE: Subpoena to Produce Documents in Floyd's of Leadville, Inc. v. Alexander Capital, LP et al.; Civil Action No. 1:22-cv-03318-DEH

Our 30(b)(6) objection is ripe for an order from the judge, so hopefully that will be resolved soon – one way or another. Assuming that's the case, we can revisit your privilege objection then.

Bryan M. Ward | Holcomb + Ward | 404-892-5695

From: Daniel J. Vedra <dan@vedralaw.com>
Sent: Thursday, October 3, 2024 4:55 PM
To: Bryan Ward <bryan.ward@holcombward.com>; Ross Carmel <rcarmel@srfc.law>; cmilazzo@cmflp.com
Cc: Paul Rachmuth <paul@paresq.com>; Holly Cole <holly@holcombward.com>; Aaron Wright <aaron@holcombward.com>
Subject: RE: Subpoena to Produce Documents in Floyd's of Leadville, Inc. v. Alexander Capital, LP et al.; Civil Action No. 1:22-cv-03318-DEH

We don't have a deal, so we still object to the subpoena. No production.

If you want to discuss further, please let me know. We'll consider any specific and well-reasoned solutions to limiting the 30(b)(6) examination, but the idea of us doing it by written questions or limiting our time when you seek more is not going to happen.



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Office: (303) 937-6540

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From: Bryan Ward <bryan.ward@holcombward.com>
Sent: Thursday, October 3, 2024 2:49 PM
To: Daniel J. Vedra <dan@vedralaw.com>; Ross Carmel <rcarmel@srfc.law>; cmilazzo@cmflp.com
Cc: Paul Rachmuth <paul@paresq.com>; Holly Cole <holly@holcombward.com>; Aaron Wright <aaron@holcombward.com>
Subject: RE: Subpoena to Produce Documents in Floyd's of Leadville, Inc. v. Alexander Capital, LP et al.; Civil Action No. 1:22-cv-03318-DEH

We're fine with having the production from Carmel, Milazzo & Feil going through Floyd's of Leadville for FOL's review first. That means CMF can make a production without having to deal with any privilege issues, which I'm sure they'd appreciate. We'd want FOL to produce to us any documents for which FOL doesn't assert privilege and for FOL to send us a privilege log for any documents withheld. We, of course, would reserve the right to contest your assertion of privilege.

The subpoena has already been sent to the correct entity. At 5:05 pm (3:05 Mountain) last Friday, September 27, we sent the attached subpoena to CMF (copying the counsel in this case, including you). We fixed and re-served the subpoena once Ross Carmel informed us that CMF was the proper entity.

The Rule 30(b)(6) issue is unrelated, so that wouldn't be part of this deal.

Dan, based on that, can you confirm whether you have an objection to CMF's producing the documents to our subpoena through you?

Thanks,

Bryan M. Ward | Holcomb + Ward | 404-892-5695

From: Daniel J. Vedra <dan@vedralaw.com>
Sent: Thursday, October 3, 2024 4:20 PM
To: Bryan Ward <bryan.ward@holcombward.com>; Ross Carmel <rcarmel@srfc.law>; cmilazzo@cmflp.com
Cc: Paul Rachmuth <paul@paresq.com>; Holly Cole <holly@holcombward.com>; Aaron Wright <aaron@holcombward.com>
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And to be clear, this does not constitute a waiver of the privilege. Just that we want to review the documents before we assess that issue. We'll need to sort this out once the subpoena gets served on the correct party.



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From: Daniel J. Vedra <dan@vedralaw.com>
Sent: Thursday, October 3, 2024 2:15 PM
To: 'Bryan Ward' <bryan.ward@holcombward.com>; 'Ross Carmel' <rcarmel@srfc.law>; 'cmilazzo@cmflp.com' <cmilazzo@cmflp.com>
Cc: 'Paul Rachmuth' <paul@paresq.com>; 'Holly Cole' <holly@holcombward.com>; 'Aaron Wright' <aaron@holcombward.com>
Subject: RE: Subpoena to Produce Documents in Floyd's of Leadville, Inc. v. Alexander Capital, LP et al.; Civil Action No. 1:22-cv-03318-DEH

All:

Floyd's of Leadville will drop its objection to this subpoena provided that (1) the recipient produces all records to me for review first; and (2) ACLP drop its objection to FOL's 30(b)(6).

Dan



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From: Bryan Ward <bryan.ward@holcombward.com>
Sent: Friday, September 27, 2024 3:05 PM
To: Ross Carmel <rcarmel@srfc.law>; cmilazzo@cmflp.com
Cc: Daniel J. Vedra <dan@vedralaw.com>; Paul Rachmuth <paul@paresq.com>; Holly Cole <holly@holcombward.com>; Aaron Wright <aaron@holcombward.com>
Subject: RE: Subpoena to Produce Documents in Floyd's of Leadville, Inc. v. Alexander Capital, LP et al.; Civil Action No. 1:22-cv-03318-DEH

Thanks, Ross. Mr. Milazzo, please see the attached correspondence, subpoena, and attachments. Feel free to give me a call with any questions or issues. Thank you,

Bryan M. Ward | Holcomb + Ward | 404-892-5695

From: Ross Carmel <rcarmel@srfc.law>
Sent: Friday, September 27, 2024 4:51 PM
To: bryan.ward@holcombward.com
Cc: Daniel J. Vedra <dan@vedralaw.com>; Paul Rachmuth <paul@paresq.com>; Holly Cole <holly@holcombward.com>; Aaron Wright <aaron@holcombward.com>; cmilazzo@cmflp.com
Subject: Re: Subpoena to Produce Documents in Floyd's of Leadville, Inc. v. Alexander Capital, LP et al.; Civil Action No. 1:22-cv-03318-DEH

As discussed, this should be directed to Carmel, Milazzo & Feil LLP.

I have copied in Chris Milazzo here to whom it should be directed.

Ross David Carmel, Esq.

Sichenzia Ross Ference Carmel LLP

[1185 Avenue of the Americas, 31st floor](#)

New York, NY 10036

T: (212) 930-9700 ext. 645 | D: 646-838-1310 | F (212) 930-9725

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Sent from my iPhone

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On Sep 27, 2024, at 4:45 PM, bryan.ward@holcombward.com wrote:

Mr. Carmel,

Please see the attached correspondence, subpoena, and attachments. Feel free to give me a call with any questions or issues. Thank you,

Bryan M. Ward

[3455 Peachtree Road NE, Suite 500](#)
[Atlanta, Georgia 30326](#)

404-892-5695 (Direct)
404-601-2803 (Main)

404-393-1554 (Fax)

bryan.ward@holcombward.com
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